

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

vs.

CASE NO. 00-6360-CR-DIMITROULEAS

RAMON VILLARES,

Defendant

EX-PARTE MOTION TO INCUR THE COST OF AN INVESTIGATOR

COMES NOW, undersigned counsel for Defendant, RAMON VILLARES, and files his Ex-Parte Motion To Incur the Cost of an Investigator and would furthermore state as follows:

1. The undersigned has been appointed pursuant to the Criminal Justice Act to represent Defendant Villares in this matter.

2. The Defendant, RAMON VILLARES, is charged with violating Title 21, U.S.C. Section 841 (a) (1) and Title 21, U.S.C. Section 846. A preliminary and limited explanation of the discovery provided indicated that the charges are sufficiently complex as to justify a comprehensive and detailed examination of discovery intended by the Government for use at trial against him.

3. The discovery consists of approximately 700 pages of documents, 500 pages of transcripts, as well as 27 audio cassette recordings, and 32 video tapes. Additionally, there are 14 co-defendants in the instant case and undersigned counsel will require extensive background research and interviews in preparation for trial.

4. Consequently, the undersigned would respectfully request advance authorization to employ Investigator Alice Barrs to assist in that regard. The undersigned would respectfully request

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advance authorization in the amount of \$2,000.00 for Ms. Barrs.

WHEREFORE, the undersigned would respectfully request that this Honorable Court grant the foregoing Motion.

DATED this 29th of January, 2001

RENE PALOMINO JR., P.A.
9555 N. Kendall Drive
Suite 101
Miami, Florida 33176
(305) 279-8287

By: 

Rene Palomino, Jr.
FBN:381292

MEMORANDUM

TO: Chief Judge (or Delegate) _____
United States Court of Appeals for the _____ Circuit

DATE: _____

FROM: _____

SUBJECT: Advance Authorization for Investigative, Expert or Other Services

It is requested that advance authorization be granted to obtain services in an amount in excess of the maximum allowed under the provisions of subsection (e)(3) of the Criminal Justice Act, 18 U.S.C. § 3006A, [or, for capital cases commenced, and appellate proceedings in which an appeal is perfected, on or after April 24, 1996, under 21 U.S.C. § 848(q)(10)(B),] as follows:

Case Name & Designation U.S.A. v. Ramon Villares, et. AL 00-6360-CR-Dimitrovas

Name of Expert or Investigator or Service Provider

Alice Barrs

Address 9555 N. Kendall Drive, Suite 101
Miami, FL 33176

Type of Service Investigator

Reasons for Application 700 pgs. documents, 500 pgs transcripts, 27 audio tapes,
32 video tapes. Additionally, 14 co-defendants that require background
research

Estimated Compensation (Non-Capital Case) \$ 2,000.00 - 50 hours @ \$ 40.00 per hr.

Estimated Compensation and Expenses (Capital Case) \$ _____

Estimated Compensation and Expenses of All Investigative, Expert, and Other Services
(Capital Case) \$ _____

I certify that the estimated compensation in excess of the maximum set forth in 18 U.S.C. § 3006A(e)(3) [or, if applicable, the estimated compensation and expenses in excess of the maximum set forth in 21 U.S.C. § 848(q)(10)(B),] appears necessary to provide fair compensation for services of an unusual character or duration and therefore recommend approval of this advance authorization in the amount of \$ _____

United States District Judge
or Magistrate Judge

Date

Advance authorization is hereby approved in the amount of
\$ _____

Chief Judge, United States Court of Appeals
(or Delegate)

Date